



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

OCT 12 1994

Robert K. Wilson, Treasurer  
Ohio Republican State Central  
and Executive Committee  
AKA: The Ohio Republican Party  
172 East State Street, Ste. 400  
Columbus, OH 43215

Identification Number: C00162339

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$96,595 in itemized contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$86,845. Please amend your report to clarify the discrepancy.

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation/employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's

94039270727

OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE  
PAGE 2

records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Lines 21(a)(i) 21(a)(ii) and 21(c) of the Detailed Summary Page of your report discloses a total of \$69,961.95, \$215,746.77 and \$563,216.24 respectively in Shared Federal/non-federal operating expenditures. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$104,402.67, \$302,217.64 and \$684,127.83. Please amend your report to clarify the discrepancy.

-The totals listed on Lines 19, 20, 21(a)(i), 21(a)(ii) and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

94039270728

OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE  
PAGE 3

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 26 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B, supporting Line 21(b) of the Detailed Summary Page, discloses a disbursement for "Postage/Kemp Event". If this was a fundraiser to support a federal candidate, it should be reported on Line 23 as an in-kind contribution. Please amend your report to clarify the the purpose of this disbursement.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

*Terry Reynolds*

Terry Reynolds  
Reports Analyst  
Reports Analysis Division

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 1 OF 1  
FORM LINE NUMBER  
11b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

OHIO REPUBLICAN PARTY

FEC ID No. C00162339

A. Full Name, Mailing Address and ZIP Code

LAKE COUNTY REPUBLICAN PARTY

170 N. ST. CLAIR

SUITE 203

PINESVILLE, OH 44077

Receipt for: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

COUNTY

REPUBLICAN PARTY

Occupation

N/A

Date (month,  
day, year)

06/16/94

Amount of Each  
Receipt this Period

1505.08

Aggregate Year-To-Date &gt; \$ 1505.08

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$ 6

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date &gt; \$

SUBTOTAL of Receipts This Page (optional)

1505.08

TOTAL This Period (last page this line number only)

1505.08

194400039121700874350

9 4 0 3 9 2 7 0 7 3 1

9 4 0 3 9 2 5 4 0 6